STEVEN C. HOLTZMAN (CA BAR NO. 144177)
sholtzman@bsfllp.com
BOIES SCHILLER & FLEXNER LLP
1999 Harrison Street, Suite 900
Oakland, CA 94612
Telephone: (510) 874-1000
Facsimile: (510) 874-1460

D. MICHAEL UNDERHILL (*pro hac vice*)
munderhill@bsfllp.com
BOIES SCHILLER & FLEXNER LLP
5301 Wisconsin Avenue NW
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131

Attorneys for Defendant
CONNECTU, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

THE FACEBOOK, INC. and MARK ZUCKERBERG,

Plaintiffs,

v.

CONNECTU, INC. (formerly known as CONNECTU, LLC), PACIFIC NORTHWEST SOFTWARE, INC., WINSTON WILLIAMS, and WAYNE CHANG,

Defendants.

Case No. 5:07-CV-01389-JW

**CONNECTU'S ADMINISTRATIVE MOTION TO SEAL:**

**(1) CONNECTU'S OPPOSITION TO PLAINTIFFS' ADMINISTRATIVE REQUEST PURSUANT TO CIVIL L.R. 7-11;**

**(2) DECLARATION OF EVAN A. PARKE AND EXHIBITS IN SUPPORT THEREOF; AND**

**(3) [PROPOSED] ORDER ON ADMINISTRATIVE REQUEST PURSUANT TO CIVIL L.R. 7-11**

Dockets.Justia.com

Pursuant to Civil L.R. 7-11 and 79-5(d), ConnectU respectfully submits this administrative motion asking the Court to file under seal ConnectU's Opposition To Plaintiffs' Administrative Request Pursuant To Civil L.R. 7-11; Declaration of Evan A. Parke and exhibits In Support Thereof; and Proposed Order On Administrative Request Pursuant To Civil L.R. 7-11.

The parties entered into, and the Superior Court of California, Superior County issued, a Stipulated Protective Order on January 23, 2006, prohibiting either party from filing in the public record any documents that have been designated as "Confidential" or "Highly Confidential" pursuant to the protective order.

ConnectU's Opposition To Administrative Request and documents filed in support thereof contain information that Facebook, in its motion to seal, alleges is covered by the Protective Order. Other documents and information at issue in this request (1) have been designated by Plaintiffs as Confidential or Highly Confidential and covered by the Protective Order and/or (2) are alleged by Plaintiffs to implicate confidentiality provisions found in a purported agreement which is the subject of dispute between the parties.[1]

ConnectU requests that its Opposition to the Administrative Request and supporting papers remain sealed.

///

///

///

///

///

///

[1] By filing this request to seal, ConnectU does not waive any arguments or rights as to (i) the admissibility or inadmissibility of evidence surrounding the purported agreement, (ii) the confidentiality or non-confidentiality of information relating to the purported agreement, or (iii) the enforceability or unenforceability of the purported agreement.

Dated: May 14, 2008

*/s/ Steven C. Holtzman*
Steven C. Holtzman

STEVEN C. HOLTZMAN (CA BAR NO. 144177)
BOIES SCHILLER & FLEXNER LLP
1999 Harrison Street, Suite 900
Oakland, CA 94612
Telephone: (510) 874-1000
Facsimile: (510) 874-1460
Email: sholtzman@bsfllp.com

D. MICHAEL UNDERHILL (*pro hac vice*)
munderhill@bsfllp.com
BOIES SCHILLER & FLEXNER LLP
5301 Wisconsin Avenue NW
Washington, D.C. 20015
Telephone: (202) 237-2727
Facsimile: (202) 237-6131

Attorneys for Defendant
CONNECTU, INC.

## CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on May 14, 2008.

Dated: May 14, 2008

/s/ *Steven C. Holtzman*